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6 ATTORNEY FOR  
7 June D. Gibson

8 UNITED STATES BANKRUPTCY COURT  
9  
10 FOR THE EASTERN DISTRICT OF CALIFORNIA

11 In Re:	)	Case #: 09-43426-C-7
	)	DC No.: KB-1
12 JUNE DEANNA GIBSON,	)	
	)	MOTION FOR ORDER
13 Debtor.	)	ABANDONING PROPERTY
	)	OF THE ESTATE
	)	
15	)	DATE: February 2, 2010
16	)	TIME: 9:30 A.M.
17	)	DEPT.: C
	)	COURTROOM: 35
18	)	Local Rule: 9014-1(f)(2)

19 TO THE HONORABLE JUDGE KLEIN:

20 JUNE DEANNA GIBSON, debtor, by and through his attorney, KEN BAKER,  
21 respectfully represents:

22 1. On October 28, 2009, debtor filed a petition under Chapter 7 of the United States  
23 Bankruptcy Code. Thomas A. Aceituno has been appointed Chapter 7 Trustee.

24 2. Debtor owns Sacramento Marble & Stone, a natural stone sales business described  
25 in Question 18 of the Statement of Financial Affairs. Request is hereby made that the court  
26 take judicial notice of the Statement of Financial Affairs of the filed Chapter 7 petition.  
27  
28

1           3. The Debtor has the inventory and office equipment of the business listed in  
2 Question 28 and Question 30 of Schedule B of her petition. Trustee Thomas A. Aceituno has  
3 requested an Order Abandoning debtor's interest in the business to limit potential liability.  
4

5           4. The assets of the business, as listed on Schedule B of the petition, have a  
6 scheduled value of \$21,593.00. The assets were claimed exempt pursuant to CCP Sec.  
7 703.140(b)(5) and (6) in the amount of \$21,593.00. Request is hereby made that the Court  
8 take judicial notice of Schedule B and Schedule C of the petition filed October 28, 2009.  
9

10           5. There is no equity in said personal property realizable for the benefit of the  
11 Chapter 7 Trustee and the estate. The property is inconsequential to the estate.

12           6. Counsel for debtor has requested an Order Shortening Time.

13           WHEREFORE, following Notice and Hearing, debtor, by and through her attorney,  
14 prays for an Order of this Court as follows:

15           1. For an Order Compelling Thomas A. Aceituno, Chapter 7 Trustee, to abandon  
16 any and all interest he may hold as Chapter 7 Trustee in the business of debtor which is  
17 known as Sacramento Marble and Stone, Rancho Cordova, California 95742 and the  
18 business assets as listed in Schedule B of the Chapter 7 petition; and  
19

20           2. For such other and further relief as this Court may deem just and proper.  
21

22 DATED: December 21, 2009

LAW OFFICES OF KEN BAKER

23  
24  
25 BY: 

KEN BAKER  
Attorney for Debtor